

Christopher E. Hawk, OSB No. 061635  
[chawk@grsm.com](mailto:chawk@grsm.com)  
 W. Gregory Lockwood, OSB No. 114415  
[wglockwood@grsm.com](mailto:wglockwood@grsm.com)  
 GORDON REES SCULLY MANSUKHANI, LLP  
 121 SW Morrison Street, Suite 1575  
 Portland, OR 97204  
 Telephone: (503) 227-8269  
 Facsimile: (503) 616-3600

*Attorneys for Defendant*

IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF OREGON  
 (Eugene Division)

MICHAEL EVANS,

Plaintiff,

vs.

GUARANTY RV, INC. a/b/n GUARANTY RV  
 CENTERS,

Defendant.

Case No. 6:19-cv-01062-MK

**STIPULATED MOTION TO  
 CONTINUE DISCOVERY AND  
 PRETRIAL DEADLINES**

**STIPULATED MOTION**

It is stipulated by the parties that all deadlines for completion of discovery and pretrial submissions should be extended for 120 days, as outlined below:

| DEADLINE                           | FROM:   | TO:   |
|------------------------------------|---|---|
| Discovery Completion               | 3/9/2020  | 7/9/2020  |
| Dispositive Motions                | 4/8/2020  | 8/6/2020  |
| Joint Alternate Dispute Resolution | 30 days after ruling on dispositive motions or 5/8/2020 | 30 days after ruling on dispositive motions or 6/8/2020 |

To date, the parties have been diligently engaging in document discovery, which has been voluminous, and written discovery. This motion is made to provide adequate time to complete

document discovery prior to the 15 depositions that the parties expect to take and allow for possible difficulties in scheduling certain non-party witnesses. It is not made with the intent to delay. Thus, for the forgoing reasons, good cause exists to extend the deadlines as outline below.  
RESPECTFULLY SUBMITTED:

DATED this 25th day of February, 2020.

GILROY NAPOLI SHORT LAW GROUP

GORDON REES SCULLY MANSUKHANI, LLP



Jeff Napoli, OSB No. 990868  
[jnapoli@gnsllawgroup.com](mailto:jnapoli@gnsllawgroup.com)  
Veronica R. Rodriguez, OSB No. 181818  
[veronica@gnsllawgroup.com](mailto:veronica@gnsllawgroup.com)  
*Attorneys for Plaintiff*

*/s/ W. Gregory Lockwood*

Christopher E. Hawk, OSB No. 061635  
[chawk@grsm.com](mailto:chawk@grsm.com)  
W. Gregory Lockwood, OSB No. 114415  
[wglockwood@grsm.com](mailto:wglockwood@grsm.com)  
*Attorneys for Defendant*